

**ICC Docket No. 05-0597**  
**Commonwealth Edison Company's Response to**  
**Citizen Utility Board's (CUB) Data Requests 8.01 – 8.31**  
**Dated: February 7, 2006**

**REQUEST NO. CUB 8.16:**

**Witness Costello (Exhibit 13.0)**

Referring to Witness Costello's rebuttal testimony at lines 421 through 422:

Please reconcile Witness Costello's testimony at lines 421 through 422 with Mr. DeCampli's testimony at lines 258-260. Is it the company's position that no additional operational savings can be achieved as suggested by Mr. DeCampli? Please explain fully.

**RESPONSE:**

There is nothing to reconcile in this data request. On lines 421-422 of Mr. Costello's rebuttal testimony (ComEd Ex. 13.0 at page 18), he testifies that "[f]rom a management perspective it is a fact that reducing O&M expense through increased efficiency is an operational goal." This continuing goal should not be confused, as the data request appears to do, with Mr. DeCampli's referenced testimony. In that testimony (ComEd Ex. 14.0 at page 13), Mr. DeCampli notes that ComEd "undertook a broad series of steps to reduce O&M costs through greater efficiency and productivity," which "efforts paid off with better performance on O&M expenses in 2003 and 2004." With respect to these initiatives, Mr. DeCampli explains that ComEd has achieved "what savings we can through efficiency and productivity." Thus, Mr. DeCampli concludes that ComEd "will not be able to keep that trend going into future years." That conclusion does not suggest that ComEd will cease striving to reduce O&M expenses through increased efficiency and productivity, wherever practical.